

REMARKS

Reconsideration and allowance of the above-identified application are respectfully requested.

Claims 1-41 are pending in the application.

The indication of allowable subject matter in claims 2-10, 12-21, 23-31 and 33-41 is acknowledged with appreciation.

Claim 29 has been amended to correct the dependency as suggested by the Examiner at paragraph 2, on page 2 of the Office Action. No new matter has been added. The breadth of the claims have not been narrowed. No claims have been amended to overcome prior art. The full doctrine of equivalents applies to each and every claim limitation. This amendment obviates the objection to claim 29 at paragraph 2, on page 2 of the Office Action. Accordingly, withdrawal of the objection to claim 29 is respectfully requested.

The objection to the Abstract at paragraph 1, on page 2 of the Office Action, is obviated by the Amendment to the Abstract set forth above. Accordingly, withdrawal of the objection to the Abstract is respectfully requested.

The rejection of claims 1, 11, 22, and 32 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 5,412,712 (Jennings) is respectfully traversed. Applicant respectfully submits that claims 1, 11, 22, and 32 are not anticipated by Jennings for the following reasons.

Concatenated prompts, for example, are sentence fragments, phrases, simple phrases, compound phrases, tabular prompts, or variable prompts, and convey information having variables or context information. An example of a concatenated prompt is "You have four new messages," which might need to be chosen from a group of possible phrases depending on the time of day the call comes in.

In the present invention, a server can be configured for dynamically generating a selected concatenated prompt from stored prompt fragments in any selected language. The selected concatenated prompt and selected language are identified based on reception of a prompt request. The following steps, for example, are conducted:

- (1) a selected executable resource for the selected concatenated prompt is executed to obtain language-independent information for the selected concatenated prompt from a database containing the language-independent information for each of a plurality of concatenated prompts;
- (2) language-specific information for the selected concatenated prompt is accessed based on the obtained language-independent information; and
- (3) the selected concatenated prompt is generated in the selected language based on selective retrieval of stored prompt fragments identified by the language-specific information.

The language-independent information may include global variables necessary for generation of the selected concatenated prompt, or identification of prompt components or variable portions (e.g., time of day, number of messages, etc.). This enables deployment of a prompt generation architecture having language-independent information separate from language-specific information, facilitating the addition of new languages to the existing server, enables the presence of redundant data to be minimized, and enables additional concatenated prompts to be added, often with minimal additions to the language-specific or the stored prompt fragments. See page 4, last paragraph to page 5, second paragraph in the present specification.

Jennings discloses a very different method in which language specific and language independent information are combined. The Examiner cites column 2, lines 18-20 of Jennings as teaching "obtaining language independent information from a database." (emphasis added) See page 2 of the present Office Action. Column 2, lines 18-20 of Jennings specifically states "[a]ccording to the principles of this invention, a voice messaging system is constructed which is language independent." Jennings use of the term "language independent" refers generally to his whole process and not to any use of specific language independent information. Further reading of Jennings' disclosure clearly shows that Jennings does not use language-independent information in his process to generate language-specific information in the same manner as the present invention.

Jennings only teaches using language-specific information to generate an announcement

as follows:

(1) “[e]ach of the language databases comprises a set of language specific voice fragments, each voice fragment is a portion of speech in a particular language.” (See column 3, lines 9-11);

(2) “each announcement is associated with a ‘semantic expression,’ having an announcement identifier, such as a number (announcement ID)... each announcement ID is associated with a set of rules ... each set of rules, comprises language specific information ... [e]ach language specific rule comprises specific information that includes any amount of: voice fragment information, variable information, and language specific construction information.” (emphasis added) (See column 3, lines 26-50).

Thus, Jennings does not teach using any language independent information to generate language specific information that is then used to generate a concatenated prompt from prompt fragments. For these reasons alone, the Section 102 rejection should be withdrawn.

The Examiner states that Jennings teaches “identifying a prompt and a selected language based on a prompt request (item 310).” See page 2 of the Office Action. However, upon closer inspection of Jennings it becomes clear that Jennings does not teach identifying a prompt a selected language based on a prompt request. See column 4, lines 21-26, which discloses that “[t]he particular language to use for a particular announcement can be determined, a priori, in a number of ways, e.g., by the type of voice messaging service provided by voice messaging system 300, by the location of the telephone line on which an incoming telephone appears, etc.”

There is no disclosure provided in Jennings for identifying a prompt and a selected language base on a prompt request. For this reason alone, the Section 102 rejection should be withdrawn.

The Examiner further states that Jennings teaches “executing a selected executable resource for the selected prompt (item 315), obtaining language independent information from a database (col. 2, ln 18-20), [and] accessing language specific information for the selected prompt based on the information (Fig. 1, item 270).” See page 2 of the Office Action. Jennings provides no disclosure of executing a selected executable resource for obtaining language-independent information from a database for the following reasons.

Jennings teaches that when a telephone call comes in, the cpu must provide an announcement that is representative of a semantic expression having an announcement ID for the specific language of the announcement previously selected. To construct this announcement, the cpu reads from memory the announcement ID identified with this semantic expression and then translates the ID to identify a set of language-specific rules associated with the semantic expression, illustrated in Fig. 2 and step 310 of Fig. 5. See column 4, lines 27-34. From the set of rules, each particular language specific rule is associated with a given "offset" into the set of rules. See column 4, lines 34-44. The cpu retrieves the first rule from the set of rules stored on a system database, referred to as block 315. See column 4, lines 44-52.

Hence, the announcement ID is simply a memory pointer employed by the cpu to obtain the set of language-specific rules for a given expression. Furthermore, the system database (315) of Jennings referred to by the Examiner contains the language-specific rules, as discussed above. Jennings does not disclose a database of language-independent information. Moreover, Jennings provides no disclosure of executing a selected executable resource for obtaining language-independent information from a database of language-independent information. For these reasons alone, the Section 102 rejection should be withdrawn.

As specified in MPEP '2131: ">A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference= *Verdegaal Bros. V. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). ... >The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). MPEP 2131 (Rev. 2, May 2004, at p. 2100-73).

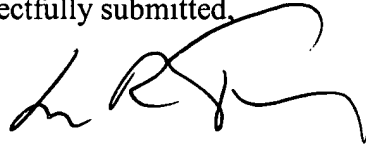
In view of the many differences between Jennings and claims 1, 11, 22, and 32, withdrawal of the Section 102 rejection is respectfully requested.

Since all of the objections and objections of record have been addressed, it is believed that the application is in condition for allowance and Notice to that effect is respectfully requested.

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Page 16

To the extent necessary, Applicant petitions for an extension of time under 37 C.F.R. 1.136. Please charge any shortage in fees due in connection with the filing of this paper, including any missing or insufficient fees under 37 C.F.R. 1.17(a), to Deposit Account No. 50-1130, under Order No. 95-449, and please credit any excess fees to such deposit account.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'L. R. Turkevich', written over a horizontal line.

By

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